

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF PENNSYLVANIA

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	:
ROBERT WINKLES	:
on behalf of himself and	:
similarly situated employees,	:
	: Civil Action No. 2:19-cv-00825 CB
<i>Plaintiff,</i>	:
	:
v.	: Electronically Filed
	:
HARBOR FREIGHT TOOLS USA, INC.,	:
	:
<i>Defendant.</i>	:
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**STIPULATION OF DISMISSAL, WITHOUT PREJUDICE, FOR PURPOSES OF  
TRANFERRING TO ARBITRATION**

The Parties hereby stipulate to the dismissal of this action, without prejudice, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), each party to bear its own costs and fees, for the purpose of transferring Plaintiff's claims to arbitration.

Respectfully submitted,

<u>/s/ Joseph H. Chivers</u> Joseph H. Chivers, Esquire The Employment Rights Group, LLC 100 First Avenue, Suite 650 Pittsburgh, PA 15222 Telephone: (412) 227-0763 <u>jchivers@employmentrightsgroup.com</u>  <i>Counsel for Plaintiff</i> <i>and all others similarly situated</i>	<u>/s/ Jennifer G. Betts</u> Jennifer G. Betts, Esquire Ogletree, Deakins, Nash, Smoak & Stewart, P.C. One PPG Place, Suite 1900 Pittsburgh, PA 15222 Telephone: (412) 246-0153 <u>jennifer.betts@ogletree.com</u>  <i>Counsel for Defendant</i> <i>Harbor Freight Tools USA, Inc.</i>
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DATED: October 21, 2019